

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JULIO & SONS COMPANY,

Plaintiff,

-against-

TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA,

Defendant.

No. 2008 CIV. 03001 (RJH)

**MOTION TO ADMIT SHANNON
W. CONWAY PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Philip M. Smith, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Shannon W. Conway
Patton Boggs LLP
2001 Ross Avenue,
Suite 3000
Dallas, Texas 75201
Telephone: (214) 758-1500
Facsimile: (214) 758-1550

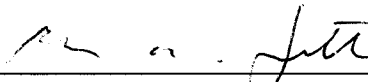
Ms. Conway is a member in good standing of the State Bar of Texas, the District of Columbia Bar and the Virginia State Bar.

There are no pending disciplinary proceedings against Ms. Conway in any State or Federal court.

Dated: April 15, 2008

New York, New York

Respectfully submitted,

By: 

Philip M. Smith (PS8132)
PATTON BOGGS LLP
1185 Avenue of the Americas
30th Floor
New York, New York 10036
Telephone: (646) 557-5100
Facsimile: (646) 557-5101

Attorneys for Plaintiff Julio & Sons Company

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JULIO & SONS COMPANY,

Plaintiff,

-against-

TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA,

Defendant.

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No. 2008 CIV. 03001 (RJH)

**DECLARATION OF PHILIP M.
SMITH IN SUPPORT OF
MOTION TO ADMIT SHANNON
W. CONWAY PRO HAC VICE**

I, Philip M. Smith, declare as follows:

1. I am a member of the law firm of Patton Boggs LLP, and counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Shannon W. Conway as counsel pro hac vice to represent the Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February of 1990. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Shannon W. Conway since January 10, 2008.

4. Shannon W. Conway is an attorney employed by the law firm of Patton Boggs LLP. I know Ms. Conway through our association as members of the same law firm, she in the Dallas, Texas office and I in the New York, New York office.

5. I have found Ms. Conway to be a skilled attorney, a person of integrity and high moral character. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Shannon W. Conway, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Shannon W. Conway, pro hac vice, which is attached hereto as Exhibit A.

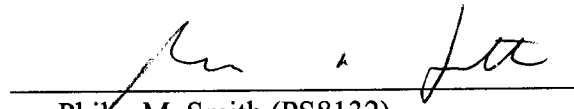
I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE it is respectfully requested that the motion to admit Shannon W. Conway pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated: April 15, 2008

New York, New York

Respectfully submitted,


Philip M. Smith (PS8132)

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

April 4, 2008

Re: Shannon Willene Conway, State Bar Number 24052047

To Whom It May Concern:

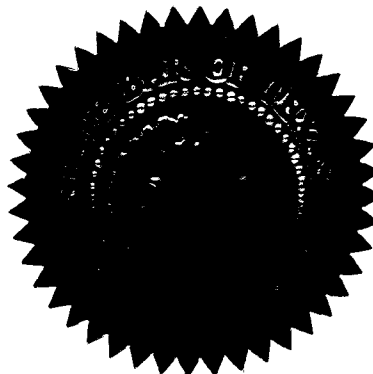
This is to certify that Ms. Shannon Willene Conway was licensed to practice law in Texas on January 20, 2006, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No previous disciplinary sanctions have been entered against Ms. Conway's law license.

Sincerely,

John A. Neal
Chief Disciplinary Counsel

JN/ss



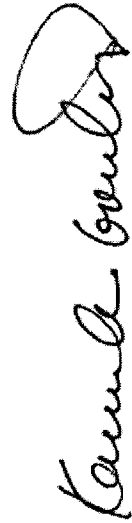


VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

*This is to certify that **SHANNON WILLENE CONWAY** is an active member of the Virginia State Bar in good standing. **MS. CONWAY** was licensed to practice law in Virginia on **OCTOBER 14, 1999** after successfully passing the bar examination given by the Virginia Board of Bar Examiners.*

Issued April 2, 2008


Karen A. Gould
Executive Director and
Chief Operating Officer



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

SHANNON W. CONWAY

was on the 3RD day of JUNE, 2002
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on April
3, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JULIO & SONS COMPANY,

Plaintiff,

-against-

TRAVELERS CASUALTY AND
SURETY COMPANY OF AMERICA,

Defendant.

No. 2008 CIV. 03001 (RJH)

**ORDER FOR ADMISSION OF
SHANNON W. CONWAY PRO
HAC VICE ON WRITTEN
MOTION**

Upon the Motion of Philip M. Smith, attorney for Defendant and said sponsor attorney's
declaration in support;

IT IS HEREBY ORDERED that

Shannon W. Conway
PATTON BOGGS LLP
2001 Ross Avenue
Suite 3000
Dallas, Texas 75201
Telephone: (214) 758-1500
Facsimile: (214) 758-1550
sconway@pattonboggs.com

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the
United States District Court for the Southern District of New York. All attorneys appearing
before this Court are subject to the Local Rules of this Court, including the Rules governing
discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,
counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall
forward the pro hac vice fee to the Clerk of Court.

DATED: April __, 2008
New York, New York:

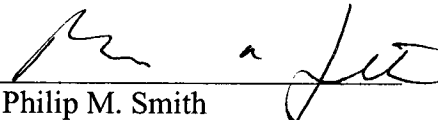
By: _____
United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing **MOTION TO ADMIT SHANNON W. CONWAY PRO HAC VICE, DECLARATION OF PHILIP M. SMITH IN SUPPORT OF MOTION TO ADMIT SHANNON W. CONWAY PRO HAC VICE, and ORDER ON ADMISSION OF SHANNON W. CONWAY PRO HAC VICE ON WRITTEN MOTION** were served upon attorneys for the Defendants as follows via first class mail:

James Sandnes, Esq.
Boundas, Skarzynski, Walsh & Black, LLC
One Battery Park Plaza, 32nd Floor
New York, NY 10004

Dated: April 15, 2008


Philip M. Smith